



## CLARENCE ENVIRONMENT CENTRE

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### Submission on the Draft CAP 2

#### Introduction

As a representative of the North Coast Environment Council (NCEC) on the CAP2 Working Group, I have been involved in the development of the Plan. However, it must be understood that I have not been closely involved in the process, having joined the team halfway through the process, and on at least one occasion, was unable to attend because of a prior engagement. In short, my understanding of the overall aims and strategies are sketchy. Nevertheless, wearing my other hat as Honorary Secretary of the Clarence Environment Centre (CEC), I submit the following comments.

#### General overview

The CEC has considered the Draft Plan and believes that, overall, the Plan contains an excellent compilation of the threats, current and future, that face natural resource management (NRM) on the north coast of NSW, and satisfactorily identifies many of the matters that need to be . However, we found it to be short on detailed actions. We also have concerns about the mapping component which, in our opinion, are difficult to interpret. Few locations or recognisable features are included on the maps making it difficult to pinpoint specific locations. We also believe the legends need to be much clearer for the layman to understand.

We acknowledge the obvious uncertainties faced by the Catchment Management Authority (CMA), in terms of the degree of Government support it can expect, which will have a corresponding influence on the degree to which the “aspirational goals” will be achieved. However, we would have preferred to see a firmer tone used when describing means to be used to achieve those aspirational goals.

For example, coal seam gas mining is identified time and again as a major threat to NRM across the region, but not a single mention of any way to curb that threat other than to suggest they be, “*managed appropriately*”.

It would have been encouraging to see at least one comment along the lines that - “No coal seam gas mining, or mining that generates, or involves the use of, toxic substances, will be allowed in any urban water supply catchment”. However, no such firm commitment is made, probably for the very good reason that the CMA does not have the power to carry it out.

Another example relates to the logging industry. Despite acknowledging that: “*The Northern Rivers Region is the most biologically diverse region in New South Wales*”, and that, “*the Region’s biodiversity is at risk from a suite of threats ...*”, including, “*timber harvesting*”, etc, there is not a single strategy put forward to curb the current excesses.

Again it would have been encouraging to see a commitment to “make the timber industry **ecologically** sustainable, for example, by allowing no more than 20% of basal area removal of

timber during any one logging event, and restricting logging cycles to a minimum of 20 years. That would possibly, depending on the degree of post harvest management of threats such as weeds and dieback, lead to an ecologically sustainable industry.

The CAP2's stated aim identifies that *“The sustainable use of our natural resources is integral to **livelihoods** that are based on our natural resource-based industries (i.e. agricultural, forestry)”*. The removal of more than 35% of forest canopy by excessive logging rates across the state (currently upwards of 70% basal area), has been identified as a trigger for Bell Miner Associated Dieback (BMAD)(NSW Scientific Committee, 2009). According to the Scientific Committee, some 6 million hectares of native forest is at risk in NSW from the disease which is expanding rapidly across north eastern areas of the State.

The CMA is aware of the problem, having been kept fully informed by the BMAD Working Group since 2006, yet there is no mention of dieback or the need to consider the long-term implications of the disease to the timber industry, or any strategy to address the problem when supposedly supporting the “sustainable” use of this natural resource.

Another notable omission from the plan is the widespread use of “burning off” by graziers, despite “inappropriate fire regimes” being listed as a key threatening process under the Threatened Species conservation Act. This is widely undertaken ostensibly to achieve either a “green pick” for cattle; hazard reduction, or because “the Australian bush needs burning”. However, in reality this is simply land-clearing by stealth. The problem will be exacerbated by global warming, but is not addressed in CAP2, possibly placed in the too-hard basket?

While on the subject of grazing, we believe there is inadequate focus on the threats of grazing on biodiversity, which is also listed as a primary threat to hundreds of native flora and fauna that are currently facing extinction. While “inappropriate” grazing is identified as something that requires “educational programs” to be offered, and an acknowledgement that *“removing grazing stock from the banks of an estuary not only improves riparian vegetation condition, it also improves estuarine water quality for aquaculture”*, there is nothing to suggest that grazing will actually be excluded from any sensitive ecosystems, particularly in public state forests.

We point out that the current NSW Inquiry into the management of public land, dominated by The Shooters and Liberal-National Parties, is almost certain to recommend the introduction of logging and grazing into the state's national parks as well.

Another issue that we believe receives virtually no mention is the need for wildlife migration corridors in the face of climate change. This vital matter receives just a single sentence: *“Improve the extent, connectivity, linkages and condition of terrestrial, aquatic and marine native habitats and fauna communities”*. In fact, other than admitting that: *“Changes and extremes in climate can have a devastating impact on natural resources”*, and accepting that we have no control over climate change (something we vehemently disagree with, particularly in terms of the level of climate change), there is no proposed actions to mitigate the effects.

There could have been a plan to focus energies and resources on creating “connectivity and linkages”, but again there is nothing, presumably because of potential conflicts with other aims that support sustainable economic and social development.

## **In conclusion**

The stated purpose of CAP2 – is the *“sustainable management of the Region's natural resources between 2013 and 2023”*. We are also told that: *“Sustainable natural resource management refers to how we manage our natural resources, with a specific focus on management that ensures that*

*they are sustainable, and can continue to provide for both present and future generations”.*

We believe that, in a region where population growth is uncapped, this objective will be extremely difficult if not impossible to attain.

Biodiversity in the region is in decline, something acknowledged in every biodiversity management plan at all levels of government. The Clarence Valley, at the heart of the NRCMA's management responsibility, has suffered the greatest percentage loss of native vegetation in the state for the past 2 years, and this decline has occurred under the watch of the CMA and CAP1. Any reversal of these trends will, in our opinion, take great commitment and resolve, and cannot be achieved by simply setting 'aspirational' goals that then have to be prioritised to concentrate on those areas that are identified as having the greatest resilience, i.e. where there is the greatest chance of achieving some success (knowing there is a high potential that a mining company will likely undo any good that has been achieved).

We believe the key to any success CAP2 may achieve, will be compliance monitoring and enforcement, subjects that receive no mention in the Plan, and that have been widely acknowledged as being a failure in the past.

As realists, we also understand that the degree of effectiveness of CAP2 will closely correlate with the amount of funding made available. Therefore, much of the burden of bush regeneration will, as in the past, be carried by an ever-decreasing number of volunteers, and we should point out that there is nothing more discouraging to volunteers working on revegetation of a wildlife corridor, for example, than finding a bulldozer 'under-scrubbing' neighbouring rural small-holdings, or a logging team flattening a nearby forest.

On that note, we thank the Minister for the opportunity to comment.

Yours sincerely  
John Edwards  
Honorary Secretary